

Michael J. Geraghty, Esq. (NJ No. 026161987)
SILLS CUMMIS & GROSS P.C.
The Legal Center
One Riverfront Plaza
Newark, New Jersey 07102
(973) 643-7000
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DOREMUS LAND 672, LLC,

Civil Action No. 2:23-cv-02850-ES-AME

Plaintiff,

v.
ZARIZ TRANSPORT, INC. and YAAKOV
GUZEGUL,

Defendants.

**NOTICE OF MOTION FOR LEAVE TO
WITHDRAW AS PLAINTIFF'S COUNSEL**

PLEASE TAKE NOTICE that on Monday, April 7, 2025, at 9:00 A.M. in the forenoon, or as soon thereafter as counsel may be heard, Michael J. Geraghty, Morgan H. Durr and Sills Cummis & Gross P.C. (collectively, "Sills Cummis"), shall move before the United States District Court for the District of New Jersey, at the Martin Luther King Building & Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for an Order pursuant to Local Civil Rule 102.1: (i) granting Sills Cummis' motion for leave to withdraw as attorneys of record for Plaintiff Doremus Land 672, LLC; and (ii) and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of its motion, Sills Cummis shall rely on the Declaration of Michael J. Geraghty, Esq. dated March 13, 2025.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted with this motion.

Dated: March 13, 2025

SILLS CUMMIS & GROSS, P.C.
Attorneys for Plaintiff

By: /s/ *Michael J. Geraghty*
MICHAEL J. GERAGHTY

CERTIFICATE OF SERVICE

I, Michael J. Geraghty, certify that by Order dated September 9, 2025 (D.E. No. 39), the Court granted the attorneys of record for the above-named defendants (“Defendants”) leave to withdraw as counsel for the Defendants. I am unable to confirm accurate addresses for each of the Defendants except I have identified Lorium PLLC as the registered agent for defendant Zariz Transport, Inc., and online research discloses that Defendant Zariz Transport, Inc., whose president is Defendant Yaakov Guzelgul (misspelled in the caption as “Yaakov Guzegul”), has a place of business at the address listed below in Boca Raton, FL, and Defendant Yaakov Guzelgul owns the residential property listed below.

I further certify that on March 13, 2025, I caused a true copy of the foregoing Notice of Motion and all papers filed in support of the motion to be (a) delivered to Plaintiff DOREMUS LAND 672, LLC, c/o Anthony Berritto, via email to Mr. Berritto’s email address, which is the mode of communication with Sills Cummis & Gross P.C. specified by Doremus Land 672, LLC; and (b) deposited with the United States Postal Service for delivery via First Class Mail to the following:

LORIUM PLLC
Registered Agent for Zariz Transport, Inc.
197 S. FEDERAL HIGHWAY, SUITE 200
BOCA RATON, FL 33432

YAAKOV I. GUZELGUL
7601 NORTH FEDERAL HIGHWAY, SUITE B-205
BOCA RATON, FL 33487

/s/ Michael J. Geraghty
MICHAEL J. GERAGHTY

Dated: March 13, 2025